

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS & ENERGY

<b>Proceeding by the Department of</b>	)	
<b>Telecommunications and Energy on Its Own</b>	)	
<b>Motion To Implement the Requirements Of</b>	)	<b>DTE. 03-60</b>
<b>The Federal Communications Commission's</b>	)	
<b>Triennial Review Order Regarding Switching</b>	)	
<b>For Mass Market Customers</b>	)	

**CONVERSENT’S SIXTH SET OF INTERROGATORIES TO VERIZON**

Conversent Communications of Massachusetts, LLC (“Conversent”) submits to  
Verizon Massachusetts (“Verizon”) the following information requests.

**INSTRUCTIONS**

- 1. Each interrogatory should be answered on a separate page preceded by the request and by the name of the person responsible for the answer;
- 2. Please provide answers as they are completed;
- 3. These interrogatory shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests;
- 4. If an answer refers to Verizon’s response to another interrogatory in this proceeding, please provide that response with the answer;
- 5. If Verizon cannot answer a request in full, answer to the extent possible and please state why Verizon cannot answer the request in full;
- 6. If Verizon refuses to respond to any interrogatory by reason of a claim of privilege, please state the privilege claimed and the facts relied upon to support the claim of privilege.

**INTERROGATORIES**

CONV-VZ-6-1	Referring to the Wholesale Provisioning Tracking System (WPTS) discussed in the “SUPPLEMENTAL INITIAL PANEL TESTIMONY OF VERIZON MASSACHUSETTS, December 17, 2003”, provide any and all user manuals, supporting documentation, policies, instructions and communications
-------------	---

	provided to users on a normal basis intended to assist the user in the WPTS system usage.
CONV-VZ-6-2	Provide copies of all training materials related to all hot cut processes, not provided in CONV-VZ-01, provided to the following groups of Verizon employees; CLEC community, the Regional CLEC Coordination Center (RCCC), Verizon frame organization.
CONV-VZ-6-3	Provide examples of output reports from the WPTS with descriptive information on the output report and how users should interpret the output reports.
CONV-VZ-6-4	Provide examples of output reports from the WPTS with detailed description of how the reports are used in the day-to-day operations the reports are intended to support.
CONV-VZ-6-5	Provide all information, documentation, work-papers, policies and any other type of information Verizon has access to that identify Verizon's efforts to maintain the accuracy of the information provided by WPTS.
CONV-VZ-6-6	Provide all information, documentation, work-papers, policies and any other type of information Verizon has access to that identify the current accuracy capabilities of Verizon's WPTS.
CONV-VZ-6-7	Provide all information, documentation, work-papers, policies and any other type of information Verizon has access to that identify the actual service level performance of the Verizon's WPTS.
CONV-VZ-6-8	Provide an architectural description and flow charts of the Wholesale Provisioning Tracking System (WPTS).
CONV-VZ-6-9	Provide a description by functionality of all interfaces the WPTS uses in accessing information from Verizon's OSS.
CONV-VZ-6-10	Does Verizon have an upgrade plan in place to support the WPTS?
CONV-VZ-6-11	If yes to CONV-VZ-10 please describe the upgrade plan and process.
CONV-VZ-6-12	Provide examples of the user interfaces provided by the WPTS.
CONV-VZ-6-13	Provide copies of the Verizon documents provided to developers/project managers/programmers/etc in the initial development of the WPTS that describe the system and personnel requirements for the WPTS.
CONV-VZ-6-14	Provide copies of the acceptance tests and results Verizon used for implementation of the WPTS.
CONV-VZ-6-15	Does Verizon have quality control processes at the technician level for users of the WPTS?
CONV-VZ-6-16	Provide Verizon's policies for WPTS quality control of each Verizon interfacing organizations and WPTS user group.

- CONV-VZ-6-17 Please discuss in detail Verizon’s definition of a successful hot cut.
- CONV-VZ-6-18 When hot cuts fail or produce “poor” results, does Verizon maintain records of problems associated with the poor hot cut performance levels?
- CONV-VZ-6-19 If the answer to CONV-VZ-18 is yes please provide copies of the records Verizon maintains of problems associated with hot cut poor performance levels.
- CONV-VZ-6-20 Please discuss in detail Verizon’s root cause analysis of any of these problems identified in CONV-VZ-19.
- CONV-VZ-6-21 What is the basis of the ACTIVITY DESCRIPTION, column B, TAB 1 through 10, pages 1- 32 of Exhibit Supp-III? How was this information acquired?
- i. Who provided this activity description?
  - ii. What instructions were given to the providers of this information?
  - iii. Provide copies of all instructions used in the development of activity descriptions.
  - iv. What processes were used to develop the Activity Descriptions?
  - v. What controls were applied to the development of the Activity Descriptions to insure accuracy?
- CONV-VZ-6-22 What is the basis of the Connect Times, column C, TAB 1 through TAB 10, pages 1- 32 of Exhibit Supp-III?
- i. How was this Connect Time information acquired?
  - ii. Who provided the Connect Time?
  - iii. What instructions were given to the providers of this Connect Time information?
  - iv. Provide copies of all instructions used in the development of Connect Times.
  - v. Was averaging a part of the Connec Time information development
  - vi. What controls were applied to the development of the Connect Time to insure accuracy?
  - vii. Were time and motion studies used in the development of connect time.
- CONV-VZ-6-23 What is the basis of the Connect Typical Occurrence, column D, TAB 1 through TAB 10, pages 1- 32 of Exhibit Supp-III?
- i. How was this Connect Typical Occurrence data acquired?
  - ii. Who provided the Connect Typical Occurrence data?

- iii. What instructions were given to the providers of this Connect Typical Occurrence information?
- iv. Provide copies of all instructions used in the development of Connect Typical Occurrence data.
- v. Was averaging a part of the Connect Typical Occurrence information development?
- vi. What controls were applied to the development of the Connect Typical Occurrence data to insure accuracy?
- vii. What sources of data contributed to the development of the Connect Typical Occurrence data?

CONV-VZ-6-24

What is the basis of the Connect Forward Looking Adjustment, column E, TAB 1 through TAB 10, pages 1- 32 of Exhibit Supp-III?

- i. How was this Connect Forward Looking Adjustment data acquired?
- ii. Who provided the Connect Forward Looking Adjustment data?
- iii. What instructions were given to the providers of this Connect Forward Looking Adjustment information?
- iv. Provide copies of all instructions used in the development of Connect Forward Looking Adjustment data.
- v. Was averaging a part of the Connect Forward Looking Adjustment information development
- vi. What controls were applied to the development of the Connect Forward Looking Adjustment data to insure accuracy?
- vii. What sources of data contributed to the development of the Connect Forward Looking Adjustment data?

CONV-VZ-6-25

What is the basis of the Disconn. Times, column G, TAB 1 through TAB 10, pages 1-32 of Exhibit Supp-III?

- i. How was this Disconn. Time information acquired?
- ii. Who provided the Disconn. Time?
- iii. What instructions were given to the providers of this Disconn. Time information?
- iv. Provide copies of all instructions used in the development of Disconn. Times.
- v. Was averaging a part of the Connect Time information development

- vi. What controls were applied to the development of the Disconn. Time to insure accuracy?
  - vii. Were time and motion studies used in the development of connect time.
- CONV-VZ-6-26      What is the basis of the Disconn. Typical Occurrence, column H, TAB 1 through TAB 10, pages 1-32 of Exhibit Supp-III?
- i. How was this Disconn. Typical Occurrence data acquired?
  - ii. Who provided the Disconn. Typical Occurrence data?
  - iii. What instructions were given to the providers of this Disconn. Typical Occurrence information?
  - iv. Provide copies of all instructions used in the development of Disconn. Typical Occurrence data.
  - v. Was averaging a part of the Disconn. Typical Occurrence information development?
  - vi. What controls were applied to the development of the Disconn. Typical Occurrence data to insure accuracy?
  - vii. What sources of data contributed to the development of the Disconn. Typical Occurrence data?
- CONV-VZ-6-27      What is the basis of the Disconn. Forward Looking Adjustment, column I, TAB 1 through TAB 10, pages 1-32 of Exhibit Supp-III?
- i. How was this Disconn. Forward Looking Adjustment data acquired?
  - ii. Who provided the Disconn. Forward Looking Adjustment data?
  - iii. What instructions were given to the providers of this Disconn. Forward Looking Adjustment information?
  - iv. Provide copies of all instructions used in the development of Disconn. Forward Looking Adjustment data.
  - v. Was averaging a part of the Disconn. Forward Looking Adjustment information development?
  - vi. What controls were applied to the development of the Disconn. Forward Looking Adjustment data to insure accuracy?
- CONV-VZ-6-28      What is the basis of the Travel to Remote Central Office, cell B44, column B, TAB 1 through TAB 10, page 33 (document “Times By Activity By Organization”) of Exhibit Supp-III?
- i. How was this Travel to Remote Central Office developed?
  - ii. Who provided the data for the times used?

- iii. What instructions were given to the providers of this Travel to Remote Central Office data?
  - iii. Provide copies of all instructions used in iii above.
  - iv. Was averaging a part of the Travel to Remote Central Office-Time?
- CONV-VZ-6-29      What is the basis of the Pre-wire Line (s), cell B45, column B, TAB 1 through TAB 10, (document “Times By Activity By Organization”) found at page 33 of Exhibit Supp-III?

  - i. How was this Pre-wire Line (s) developed?
  - ii. Who provided the data for the Pre-wire Line (s) time?
  - iii. What instructions were given to the providers of this Pre-wire Line (s) data?
  - iv. Provide copies of all instructions used in Pre-wire Line (s) time development.
- CONV-VZ-6-30      What is the basis of the Perform Hot Cuts on Due Date cell B46, column B, TAB 1 through TAB 10, (document “Times By Activity By Organization”) page 33 of Exhibit Supp-III?

  - i. How was this Perform Hot Cuts on Due Date time developed?
  - ii. Who provided the data for the Perform Hot Cuts on Due Date time?
  - iii. What instructions were given to the providers of this Perform Hot Cuts on Due Date data?
  - iv. Provide copies of all instructions used in Perform Hot Cuts on Due Date time development.
- CONV-VZ-6-31      Please provide all documents, work-papers and other documentation used to derive and support the data found on Tab “Database”, cells F2 through F49, (document “Times By Activity By Organization”) found at page 33 of Exhibit Supp-III.
- CONV-VZ-6-32      Please provide all documents, work-papers and other documentation used to derive and support the data found on Tab “Factors” of document “Times By Activity By Organization” found on page 33 of Exhibit Supp-III.
- CONV-VZ-6-33      Please discuss the entity and the decision making process that governs OSS investments and OSS improvements. As part of the answer, please discuss and identify the decision criteria used by VZ in determining whether certain proposed investments and improvements in OSS will be made or rejected. Also discuss whether VZ performs a cost benefit analysis as part of the decision making process. Unless the answer is an unqualified no, please

identify the various cost and benefit components that are reflected in the analysis. Please provide all documents that support the answer.

CONV-VZ-6-34

On page 15 of the Initial Hot Cut Panel Testimony, dated November 14, 2003, VZ states: “Subject to those two essential qualifications, Verizon of MA's hot cut processes use automated technology to the maximum extent that is practical and efficient. “ With respect to this statement, please answer the following questions:

- i. What criteria are used to determine what is “practical” and what is “efficient.” Please provide all documents that support the answer.
- ii. Please discuss whether VZ views the current situation as the best that can be achieved and no further improvements can be achieved. Unless the answer is an unqualified yes, please discuss what improvements can still be achieved, when VZ believes they will be implemented and detail the planned improvements. Please provide all supporting documentation.

CONV-VZ-6-35

Please identify what assumptions were made for purposes of the non-recurring cost studies with respect to the technology mix for loop facilities. As part of the answer, please identify the following:

- i. the percentage of loops served on copper feeder and distribution facilities,
- ii. the percentage of loops served on fiber based feeder facilities and copper distribution facilities (and please identify what percentage of those fiber based loops are assumed to be NGDLC versus UDLIC.)
- iii. the percentage of loops that 100% fiber based loops.

CONV-VZ-6-36

Are the cost of disconnect activities the costs for future disconnects (subsequent to the connect activities) or are these the disconnect activities associated with the cutover of the facilities that precede the connect activities.

CONV-VZ-6-37

Please identify all instances in which time and motion studies were used to support the labor time estimates include the cost studies. Further, provide all documents associated with those time and motion studies.

CONV-VZ-6-38

Please provide to Conversent responses to all information requests of all other active parties to this proceeding.

CONV-VZ-6-39	Referring to Verizon switch contracts with Nortel and Lucent, provide the Verizon cost for each vendor on a per line basis for vendor services for an office replacement (for example, an analog switch replacement migrating existing customers from the old switch technology to the new switch technology) scenario. Include a copy of the vendor contracts illustrating this cost.
CONV-VZ-6-40	List the details of the main distribution frame wiring and testing service provided by the vendors Nortel and Lucent in a switch replacement scenario.
CONV-VZ-6-41	Referring to Verizon switch replacement scenarios, provide a list of task and the activity times on a per line basis which Verizon expends over and beyond those provided by the switch vendor. On a per line basis provide Verizon's cost for these switch replacement tasks.
CONV-VZ-6-42	Referring to Verizon switch contracts with Nortel and Lucent, provide the Verizon cost for each vendor on a per line basis for vendor services for an area cut (for example the transfer of customer service from one wire center area to another wire center area, generally a cross boundry transfer) MDF wiring and testing scenario. Include a copy of the vendor contracts illustrating this cost.
CONV-VA-6-43	In Verizon's opinion, what Verizon win-back service order activity is similar too the hot cut processes?
CONV-VZ-6-44	Describe the cut-over process for Verizon win-back customers for coordinated cuts involving change orders.
CONV-VZ-6-45	Describe the cut-over process for Verizon win-back customers for coordinated cuts involving to and from "T&F" orders.
CONV-VZ-6-46	What additional charges do win-back customers pay when coordinated cuts are required for the provisioning of services?
CONV-VZ-6-47	What Verizon organizations are involved in win-back customer coordinated cuts?



CONV-VZ-6-48	What are the responsibilities of Verizon organizations involved in win-back customer coordinated cuts?
CONV-VZ-6-49	Provide copies of the detail business processes Verizon uses for win-back customer coordinated cuts?
CONV-VZ-6-50	From Verizon's perspective describe in detail the differences between win-back coordinated cuts and wholesale coordinated cuts?
CONV-VZ-6-51	When errors in service request are encountered by Verizon technicians during the Verizon Hot Cut process, how are these errors resolved?
CONV-VZ-6-52	How do technicians charge the time they spend resolving problems on Verizon Hot Cuts?
CONV-VZ-6-53	Provide Verizon time reporting records demonstrating the amount of time Verizon technicians spend resolving problems with Verizon Hot Cuts?
CONV-VZ-6-54	Does Verizon do hot cuts in Vermont using the WPTS process?
CONV-VZ-6-55:	Please identify all of the central offices in Massachusetts (by name and CLLI code) in which NEON has a collocation arrangement. Please identify the type of collocations.
CONV-VZ-6-56:	Please identify all of the central offices in Massachusetts (by name and CLLI code) in which NSTAR has a collocation arrangement. Please identify the type of collocations.
CONV-VZ-6-57:	Please identify all of the central offices in Massachusetts (by name and CLLI code) in which Metromedia Fiber Network has a collocation arrangement. Please identify the type of collocations.
CONV-VZ-6-58:	Please identify all of the central offices in Massachusetts (by name and CLLI code) in which Wiltel has a collocation arrangement. Please identify the type of collocations.
CONV-VZ 6-59:	Please identify all of the central offices in Massachusetts (by name and CLLI code) in which Fiber Tech has a collocation arrangement. Please identify the type of collocations.

Dated: December 22, 2003

---

Scott Sawyer  
Vice President, Regulatory  
CONVERSENT  
COMMUNICATIONS OF  
MASSACHUSETTS, LLC  
222 Richmond Street, Suite 301  
Providence, RI 02903  
(401) 490-6377